

Lisa Henshaw - 1/22/04

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1 IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF MARYLAND

3 JEFFREY F. and
DONNA LAWRENCE

4 Plaintiffs

CIVIL ACTION NO.

5 vs.

6 THE "IMAGINE...!" YACHT, LLC, et al.

RDG-02-CV-3224

10 The deposition of LISA HENSHAW was held
11 on Thursday, January 22, 2004 commencing at 3:30
12 p.m. at the Law Offices of Sher & Blackwell, 1850 M
13 Street, N.W., Suite 900, Washington, D.C. 20036
14 before Louisa B. McIntire-Brooks, RPR, CSR.

21 REPORTED BY: Louisa B. McIntire-Brooks, RPR, CSR

2 (Pages 2 to 5)

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<p style="text-align: right;">Page 6</p> <p>1 Q. What made you decide on the Imagine? 2 A. I liked the boat. They were right out of 3 Annapolis and stuff and Harrington South, where we 4 keep our sailboat recommended them. 5 Q. Where you keep your personal sailboat? 6 A. Um-hum. That was sort of a reason too 7 because we enjoy sailing and stuff and we thought 8 other people might. 9 Q. Had you ever been on a schooner such as the 10 Imagine before you booked it? 11 A. No. 12 Q. Did -- 13 A. Well, I have been on sailboats, not that 14 big. 15 Q. Have you ever been on any sailboats that have 16 fired greeting cannons or anything like that? 17 A. No. 18 Q. Did the website have anything to do about 19 saluting other ships with a cannon -- 20 A. No. 21 Q. -- as part of the sale?</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. Who gave you the authorization to sign it -- 2 A. Marc Fink. 3 Q. Marc Fink? 4 A. Um-hum. 5 Q. Did he ever look at it? 6 A. No. 7 Q. The agreement? 8 A. No. 9 Q. Did you ever think it was necessary to have 10 one of the lawyers who do maritime law look at it? 11 A. No, I usually read over the contracts. If 12 I do have some questions, I don't understand 13 something, I will ask. I usually go to John Butler. 14 Q. John Butler? 15 A. Um-hum. 16 Q. Before you signed it, you reviewed this 17 contract? 18 A. Yes. I look at everything I sign. 19 Q. That's why you work in a law firm? 20 A. Um-hum. 21 Q. Did you have any questions or any issues with</p>
<p style="text-align: right;">Page 7</p> <p>1 A. No. 2 Q. And who did you contact to set up the -- 3 A. The charterer. I wanted -- I was looking 4 over the contract today just to refresh my memory a 5 little bit. Christie, Crystal. That was my contact 6 over there. 7 Q. Okay. 8 A. Davis or something. The person who at 9 that time was in charge of doing the charters. 10 Q. Did you have any questions over about the 11 charter or the law firm's responsibility with reference 12 to a charter of a vessel? 13 A. I just asked basically where they sailed, 14 what kind of food and beverages would they have. 15 Pretty standard stuff, the cost, obviously. Where 16 we should meet, what we should wear. 17 Q. Did you have anyone here at the firm review 18 the charter agreement that you received? 19 A. No. 20 Q. No one reviewed it? 21 A. No.</p>	<p style="text-align: right;">Page 9</p> <p>1 any of the paragraphs of that contract -- 2 A. No. 3 Q. -- that you were concerned about? 4 A. No. 5 Q. How did you get from wherever you started to 6 where the schooner was? 7 A. How did I get there? 8 Q. Yeah, personally? 9 A. We drove. 10 Q. Drove with Mr. Fink, Mr. Pike? 11 A. Mr. Pike. 12 Q. I'm sorry. It's been a long day. You drove 13 with Mr. Pike? 14 A. Mr. Pike. 15 Q. When you got there and got on the schooner, 16 do you have any recollection how long it was before the 17 cannon was fired? 18 A. I don't know, maybe halfway into it, maybe 19 a little bit more. 20 Q. You were out on Chesapeake Bay and I have 21 asked this question every time, I don't know if you can</p>

3 (Pages 6 to 9)

Page 10	Page 12
1 answer it or not, do you recognize any landmarks, a 2 bridge or point of land that you recognize where you 3 were near when the cannon was fired? 4 A. Bay Bridge -- I'm not sure if we were by 5 the Bay Bridge, but I remember seeing the Bay 6 Bridge. 7 Q. When was the first time that you saw the 8 cannon? 9 A. When they brought it up. 10 Q. Where did they bring it up from? 11 A. Well, I don't know -- when they were 12 bringing to the place. I didn't see exactly where 13 they brought it up from. 14 Q. Did it appear to you that they brought it 15 from below decks? 16 A. I just remember them carrying it to the 17 spot where they put it. 18 Q. Who was carrying it? 19 A. There were two women, I believe. 20 Q. Did you ask what they were going to do with 21 that?	1 top. 2 A. Okay. I would probably say like around 3 here. I don't know, around there. I may be a 4 little bit more. 5 Q. Would you put a circle and write cannon next 6 to it? And then your name? 7 A. (Marking.) 8 Q. Thank you. Now -- 9 A. Cannon copier. 10 Q. Do you remember what, if anything, the cannon 11 was sitting on when they brought it up and placed it 12 there. 13 A. Not really. I'm not really sure if it was 14 like on the side or if it was actually sitting on 15 something. I would assume it had to be sitting on 16 something because of the railing. I don't recall. 17 Q. At that point when they brought it up, do you 18 know where Mr. Lawrence was? 19 A. No. 20 Q. Do you know where anyone on -- can you 21 identify where anyone, a member of the firm was at the
1 A. No. 2 Q. Where did they take that cannon? 3 A. They took it on the right side of the 4 boat. 5 Q. Starboard side? 6 A. Yeah, right. I should know that. 7 Q. You're a sailor, that's why I said starboard. 8 A. Starboard side, between the cockpit and 9 the middle. 10 Q. Let me show you -- this is a large schematic. 11 This is a smaller part of that schematic of the yacht, 12 Imagine. This is below decks and that is the upper 13 deck. Can you point out on there -- 14 A. This is the cockpit, right here? 15 Q. This would be the cockpit. This is the 16 wheel. 17 A. Right. Okay. I want to say like here. 18 Q. Can you put it -- show where it was on the 19 top part of the deck -- 20 A. You mean -- 21 Q. This is the below deck area. This is the	1 time they brought the cannon and placed it where you 2 indicated? 3 A. Jeff, I think, Earl was down here. 4 Q. Can you just write their names there where 5 you think they were? 6 A. Okay. This is a recollection. 7 Q. I understand. That's all I'm asking for. 8 A. Jeff, Earl, maybe Pauley. I want to say 9 Marc was around here, because when they made the 10 announcement, we have been will. 11 Q. That's Marc Fink? 12 A. Yeah. I want to say Heather and then -- 13 I'm not sure if this is exactly the time, I just 14 remember at one point like Heather was over here. I 15 was sitting next to Donald at some point, but I'm 16 not sure if that was exactly at the time. Do you 17 want me to write that? 18 Q. Donald? 19 A. Kassilke. But, again I'm not sure if that 20 was around the same time. 21 Q. Do you remember where you actually were --

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	Page 14	
1	A. I was here.	
2	Q. When the cannon was fired?	
3	A. Yeah -- well, actually I was here to begin	
4	with until they -- I was here to begin with.	
5	Q. Indicating you were close to where the cannon	
6	was placed?	
7	A. Yes.	
8	Q. Initially, and did you hear them say anything	
9	before they fired the cannon, the crew members?	
10	A. Yes.	
11	Q. And what did they say?	
12	A. They said that they were going to fire the	
13	cannon, something about -- you do it when two ships	
14	are passing because another ship was coming, another	
15	boat, they said it was going to be loud, to cover	
16	your ears or to move back.	
17	Q. Did they make that announcement generally or	
18	did they go around to each person?	
19	A. It was general.	
20	Q. And when they said that, you were seated	
21	where you have indicated?	
	Page 15	
1	A. Right.	
2	Q. After they said that, where did you -- did	
3	you move?	
4	A. Yeah, I scooted down a bit.	
5	Q. Did they ask you to move?	
6	A. No, she just said it was going to be loud,	
7	it was a cannon, it was a gun.	
8	Q. I know from prior testimony, Mr. Butler was	
9	there with his wife and a very young child, 6 month	
10	old?	
11	A. Uh-huh.	
12	Q. Did you ever indicate to him that it may not	
13	be a good idea to fire the cannon?	
14	A. No.	
15	Q. Did anyone object to the cannon being fired?	
16	A. No.	
17	Q. If you -- could you have objected? Do you	
18	know?	
19	MR. STRAVITZ: Objection. You can	
20	answer.	
21	A. No. Should I answer?	
	Page 16	
1	MR. STRAVITZ: Yeah, you can.	
2	A. Repeat the question?	
3	Q. Could you have objected to them firing the	
4	cannon?	
5	MR. STRAVITZ: Objection, go ahead	
6	and answer.	
7	A. Yes, I could have objected.	
8	Q. You didn't see a need to?	
9	A. No.	
10	Q. You said you moved. Where exactly did you	
11	move to?	
12	A. I moved closer to the cockpit, just a	
13	little further away from it.	
14	Q. Can you sort of make a circle and put self	
15	down and indicate where you were when it was fired?	
16	A. He moved.	
17	Q. He, meaning?	
18	A. Mark. I probably went to about here. So	
19	put self?	
20	Q. Yes. And then put a circle.	
21	A. Circle.	
	Page 17	
1	Q. That's an indication where you were when the	
2	cannon was fired?	
3	A. Yes.	
4	Q. How far were you in feet, if you can tell me,	
5	from the cannon when it was fired?	
6	A. I don't know, 6 feet, 8 feet. I'm just	
7	trying to think, like I was sitting here, maybe to	
8	about there.	
9	Q. To the outlet?	
10	A. Yeah.	
11	Q. You're saying --	
12	A. Is that 10 feet?	
13	Q. 6, 8 feet?	
14	A. Okay.	
15	Q. Were you the closest person to the cannon at	
16	the time it was fired?	
17	A. I don't recall that.	
18	Q. You identified these other people, you don't	
19	know where Mr. Lawrence was?	
20	A. No, at the time that it was fired, I do	
21	not recall.	

5 (Pages 14 to 17)

	Page 18		Page 20
1	Q. Do you know where Mr. Pike was?	1	A. I'm taking notes, give me some paper.
2	A. He was in the cockpit.	2	Q. The guy has got Uzis in the house. Have you
3	Q. Meaning --	3	ever fired a shotgun?
4	A. Down here.	4	A. Um-hum.
5	Q. That's where you wrote Jeff; right?	5	Q. The noise that you heard from the cannon, can
6	A. Right.	6	you compare it to the shotgun or any other weapon you
7	Q. Do you know when I asked him, he didn't know	7	may have fired?
8	where you were?	8	A. It was louder. It was a lot louder. And
9	A. I'm upset.	9	I couldn't compare it. It was a completely
10	Q. I wanted to make sure.	10	different noise.
11	A. Was he there?	11	Q. It lasted --
12	MR. CHAKRABARTY: Why are you	12	A. It was quick.
13	starting trouble?	13	Q. Quick?
14	Q. Do you know if Marc Fink heard that	14	A. Yeah.
15	announcement that it was going to be loud and you	15	Q. Did you have your hands over your ears?
16	should cover your ears?	16	A. Um-hum.
17	A. I assume he did because he moved away as	17	Q. Did you look around and see other people have
18	soon as she announced it.	18	their hands over their ears?
19	Q. Do you know if Jeff --	19	A. I want to say yes.
20	A. Pike.	20	Q. After the cannon was fired, did anyone
21	Q. Jeff Pike and the other two gentlemen in the	21	immediately say to you that was really loud or my ears
	Page 19		Page 21
1	cockpit heard that?	1	are ringing or I have a dull sound in my ear?
2	A. I would assume that they did.	2	A. Yes.
3	Q. They did?	3	Q. Who was that?
4	A. I would assume that they did, yeah. But,	4	A. Jeff Lawrence.
5	I don't know for sure.	5	Q. Where was he when he said that to you?
6	Q. And did you see the other schooner coming?	6	A. At this point, I do not recall -- where
7	A. Yes.	7	was he when he said that? Oh, he came up to me.
8	Q. Nearby?	8	Q. Go ahead. I'm sorry.
9	A. Um-hum.	9	A. He came up to me.
10	Q. After the crew of the Imagine fired the	10	Q. Did he tell you where he was when the cannon
11	cannon, did the other schooner fire a cannon also?	11	was fired when he reported to you --
12	A. No. I thought it would.	12	A. No.
13	Q. Have you ever fired a gun of any kind?	13	Q. What did he tell you about his hearing at
14	A. Yes.	14	that point?
15	Q. What kind of gun?	15	A. He was like wow, that was really loud and
16	A. Some rifles, 30 odd 6, muzzle loader, some	16	he was like holding his ear.
17	handguns.	17	Q. Which ear?
18	Q. Is that your husband that did the Uzi? Was	18	A. Left.
19	he the one with the Uzi?	19	Q. Left ear?
20	A. He shot an Uzi?	20	A. Wow, that was really loud, what was all
21	Q. I don't want to bring up trouble again.	21	that about? And I explained to him, you know, the

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1 two boats passing, why did they do that? Did you 2 know they were going to do that, just questions 3 along that line.	1 Q. Did you go to Mr. Butler who had like the 2 youngest child, like 6 months --
4 Q. What did you say when he said did you know? 5 A. I said yes, I knew they were going to do 6 that, they made an announcement, they said it was 7 going to be loud and to cover your ears and he said 8 he didn't hear it.	3 A. No. 4 Q. -- and ask him? 5 A. No. 6 Q. Did anyone else come up to you and make any 7 complaints about a hearing problem as a result of the 8 cannon being fired other than Mr. Lawrence?
9 Q. He said he didn't here them? 10 A. (Shakes head.)	9 A. No. 10 Q. You never had any hearing problems; is that 11 right, you told me?
11 Q. The conversation you had with him, you were 12 still on the yacht?	12 A. No. 13 Q. After this occurrence and knowing that 14 Mr. Lawrence has filed an action for alleged hearing 15 loss from this cannon, have you had your ears checked 16 for any reason?
13 A. Um-hum. 14 Q. And the yacht was still moving? 15 A. Yeah. 16 Q. Was it under sail or motor? 17 A. I think it was under sail, again, I'm not 18 quite sure. The sails were up most of the time. 19 Q. When he said that to you and you responded, 20 did he indicate he had any difficulty hearing you at 21 that point?	17 A. No. 18 Q. How about your husband? 19 A. I don't think so, no. 20 Q. Your husband had a prior hearing disability 21 of some sort?
Page 23	Page 25
1 A. Yeah, he said that was loud, my ears 2 ringing. 3 Q. Then you had the conversation with him, did 4 he keep saying I can't hear you -- 5 A. He seemed like he was uncomfortable, he 6 seemed distress. He seemed upset too because he 7 kept asking me all these questions, why why why. 8 Q. But, you were able to have a conversation 9 with him? 10 A. Yeah. 11 Q. Were you screaming? 12 A. No. 13 Q. And after the conversation, where did he go 14 and where did you go? 15 A. We just sort of like kept floating around, 16 ate some more food, looked out. 17 Q. Since you set this up and reviewed the 18 charter, did you go around and inquire if anyone else 19 whether they had any problems as result of the cannon 20 being fired? 21 A. No.	1 A. He needs to get his ears checked. 2 Q. Is that because he doesn't listen to you? 3 A. He probably just blocks me out and says 4 he's losing his hearing. 5 Q. Did he say that the firing of cannon had any 6 effect on him? 7 A. No. 8 Q. When was the first time you found out that 9 Mr. Lawrence continued to have problems with his 10 hearing? 11 A. What do you mean? 12 Q. After you got off the vessel, when was the 13 next time you talked to Mr. Lawrence about any problems 14 that he had -- 15 A. Monday. 16 Q. What did he say? 17 A. He was still complaining that his ear was 18 bothering him, he was having problems hearing, he 19 was going to go to the doctor, he was still upset 20 about the cannon. 21 Q. When is the first time you found out there

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1 was a lawsuit filed by Mr. Lawrence? 2 A. I don't recall. 3 Q. If you did -- 4 A. When was the first time when you 5 officially sent us the thing? 6 Q. First time that you -- did you ever hear 7 before you got a third party claim filed against you 8 that Mr. Lawrence had filed suit? 9 A. Yes, he had said that he was going to. 10 Q. When was that? Do you know? 11 A. I cannot recall. 12 Q. Did you ever ask Mr. Lawrence why he didn't 13 hear the announcement as to where he was? 14 A. Yes. 15 Q. What did he tell you? 16 A. He had said that he was coming up or 17 something. 18 Q. Coming up from -- 19 A. From the galley. 20 Q. Do you know if there was anyone else in the 21 galley at the time?	Page 26 1 Q. How old are they? 2 A. Now, 17 and 15. 3 Q. Where were they at the time that the cannon 4 was fired? 5 A. They were up front, towards the front. 6 Q. Did they ever complain to you about any 7 problems with earing as a result of the cannon being 8 fired? 9 A. No. 10 Q. After Mr. Lawrence continued to complain and 11 you found out the lawsuit was filed, did anyone come to 12 you at that point and indicate that they also were 13 having some hearing problems as a result of the cannon 14 being fired? 15 A. No. 16 Q. Does Mr. Lawrence continue to complain about 17 his hearing today? 18 A. Yes. 19 Q. Does he wear a hearing aid? 20 A. Yes. 21 Q. Every day?	Page 28
1 A. No. 2 Q. Do you know of anyone who did not hear the 3 announcement other than Mr. Lawrence? 4 A. Not that they told me. 5 Q. So, as far as you know, everyone else on the 6 vessel heard, as far as you know, heard the 7 announcement? 8 MR. STRAVITZ: Objection, you can 9 answer. 10 A. As far as I know, I mean, if there were 11 people in the galley I would have no way of knowing 12 whether they heard it or not. 13 Q. As far as know, everybody that was on the 14 deck heard the announcement? 15 A. Everybody that was close to her heard it 16 and I know they did because they either backed up, 17 backed off or they held their ears. 18 Q. Did you have any children on board? 19 A. Um-hum. 20 Q. What -- 21 A. My own children.	Page 27 1 A. I couldn't tell you if it was every day. 2 I don't see him every day. 3 Q. Do you attend meetings with Mr. Lawrence? 4 A. Yes. 5 Q. And has he expressed difficulty hearing at 6 those meetings to you? 7 A. He complains about the hearing aid, it 8 picks up all this background noise and stuff. 9 Q. Anything else? 10 A. No. 11 Q. Now, you did indicate, you did the books or 12 the billing? 13 A. Yeah, the financials. 14 Q. Financials? Has the income attributable to 15 the work of Mr. Lawrence gone down or remained the same 16 or increased since 2001? 17 A. I would have to look that up. 18 Q. You don't know off the top of your head just 19 from looking at the reports? 20 A. I mean, the income for the firm has gone 21 up a little bit during the year. I'd have to look	Page 25

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<p style="text-align: right;">Page 30</p> <p>1 and see how much, we have got nine partners.</p> <p>2 Q. Are there any documents that you attribute to 3 each partner, in the hours worked or income produced 4 from their clients?</p> <p>5 A. Yes, we have reports by billing attorneys, 6 that shows hours, fees collected, billings.</p> <p>7 Q. Can you tell me whether or not Mr. Lawrence's 8 hours and billing and collections have increased, gone 9 down or remained the same since 2001?</p> <p>10 A. Not off the top of my head.</p> <p>11 Q. What do you call that if I was going to issue 12 a subpoena to you for that, what would you call that?</p> <p>13 A. Financials, I guess, fees, just say 14 financial information.</p> <p>15 MR. BOUSE: I don't think I have any 16 other questions. Thank you so much.</p> <p>17 MR. SKEEN: I just have a few. Just 18 a few.</p> <p>19 EXAMINATION BY MR. SKEEN:</p> <p>20 Q. Do you recall dealing with Crystal Davis?</p> <p>21 A. Was it Crystal? Christie or something.</p>	<p style="text-align: right;">Page 32</p> <p>1 what's been marked as Davis Exhibit Number 2 on 2 9/8/03.</p> <p>3 MR. SKEEN: I don't know if you want 4 to make another copy of it and put it in as an 5 exhibit.</p> <p>6 MR. STRAVITZ: We can do that after.</p> <p>7 Q. Now, you understood that you were chartering 8 this boat on behalf of Sher & Blackwell, did you not?</p> <p>9 A. Correct.</p> <p>10 Q. You had, I believe, you testified you had 11 authority to sign this contract?</p> <p>12 A. Um-hum.</p> <p>13 Q. That is your signature on the contract, Lisa 14 Henshaw, September 13, 2001?</p> <p>15 A. Yes.</p> <p>16 MR. SKEEN: We'll mark this as the 17 next exhibit. Have you marked that one?</p> <p>18 MR. BOUSE: I don't think I marked 19 this yet.</p> <p>20 MR. STRAVITZ: Do you want to make 21 this 1 and --</p>
<p style="text-align: right;">Page 31</p> <p>1 Q. This is a copy of a contract that was 2 identified in Crystal Davis's deposition. I just want 3 you to take a look at it and see if that was the 4 contract you signed. That is the actual deposition 5 exhibit?</p> <p>6 A. Print looks a little bit bigger than what 7 I had. Yeah, that looks like it.</p> <p>8 MR. STRAVITZ: What exactly did you 9 sign?</p> <p>10 THE WITNESS: I signed this and I 11 remember this was attached to it. The copy that I 12 have though, the print is just a little bit smaller. 13 So, maybe this is just a generic copy.</p> <p>14 MR. STRAVITZ: It's a two-page 15 agreement?</p> <p>16 THE WITNESS: Um-hum.</p> <p>17 MR. STRAVITZ: How many pages did you 18 sign?</p> <p>19 THE WITNESS: I signed one, the top 20 one.</p> <p>21 MR. STRAVITZ: And we're referring to</p>	<p style="text-align: right;">Page 33</p> <p>1 MR. BOUSE: We'll make this 1 and 2 charter will be 2. Do you want to do that now?</p> <p>3 MR. SKEEN: That's actually already 4 an exhibit.</p> <p>5 MR. STRAVITZ: You can put two 6 stickers on it.</p> <p>7 (Henshaw Deposition Exhibit Number 1 was 8 marked for purposes of identification.)</p> <p>9 Q. Now, were you surprised when they bought out 10 this cannon on deck?</p> <p>11 A. Not really surprised, no.</p> <p>12 Q. Did you feel it presented any danger to 13 anyone on the cruise?</p> <p>14 A. No, unless they turned it around and 15 pointed it at one of us, then I would have gone hey.</p> <p>16 Q. If you had known that they were going to pull 17 this cannon out and fired it on this cruise, would that 18 have affected your decision to book this cruise to 19 begin with?</p> <p>20 MR. STRAVITZ: Objection, go ahead 21 and answer.</p>

9 (Pages 30 to 33)

<p>1 A. No. I'm sorry. Repeat that again.</p> <p>2 Q. If you had --</p> <p>3 A. If I had known --</p> <p>4 Q. If you had known they were going to shoot off</p> <p>5 a cannon --</p> <p>6 A. Would it have affected my decision?</p> <p>7 MR. STRAVITZ: Objection, you can</p> <p>8 answer.</p> <p>9 A. No.</p> <p>10 MR. SKEEN: I think that's all I got.</p> <p>11 Thank you.</p> <p>12 EXAMINATION BY MR. CHAKRABARTY:</p> <p>13 Q. As a result of this incident, did you send</p> <p>14 any sort of paperwork to the chartering company?</p> <p>15 A. Yes.</p> <p>16 MR. CHAKRABARTY: I don't know</p> <p>17 whether you introduced that letter or --</p> <p>18 MR. SKEEN: I haven't put it out.</p> <p>19 MR. CHAKRABARTY: Okay.</p> <p>20 MR. SKEEN: I don't think it's</p> <p>21 disputed that she sent a letter. Crystal Davis</p>	<p>Page 34</p> <p>1 cannon fire how long a lapse between that?</p> <p>2 A. Maybe a couple minutes. It wasn't like</p> <p>3 they made the announcement and then boom.</p> <p>4 Q. In your interactions with Mr. Lawrence since</p> <p>5 this incident, have you seen a change as opposed to</p> <p>6 your interactions with him previous to this incident?</p> <p>7 A. Change like?</p> <p>8 MR. BOUSE: He blames you.</p> <p>9 A. Right, I feel bad about the whole thing.</p> <p>10 Q. Specifically with respect to some of the</p> <p>11 things you discussed earlier in terms of his hearing?</p> <p>12 A. He complains about, as I said, he</p> <p>13 complains about it. He is aggravated with the</p> <p>14 background noise. He has problems in meetings, you</p> <p>15 walk into his office, Jeff, Jeff, you know, then he</p> <p>16 gets aggravated with that. But, I mean, he's a nice</p> <p>17 man, but I mean, he's just -- you could just tell</p> <p>18 that at times it bothers him.</p> <p>19 Q. Previous to this incident, did he ever have</p> <p>20 any of these problems?</p> <p>21 A. No.</p>
<p>1 identified it.</p> <p>2 Q. Mr. Bouse asked you, because you made a</p> <p>3 reference to one ear or the other, in terms of when</p> <p>4 Mr. Lawrence told you he was having problems right</p> <p>5 after the cannon blast?</p> <p>6 A. Uh-huh.</p> <p>7 Q. And you -- do you actually specifically</p> <p>8 remember which ear or was it just --</p> <p>9 A. He was looking at me and, but, it would</p> <p>10 have been this way. Do you see what I am saying?</p> <p>11 Q. You specifically remember which ear he was</p> <p>12 talking about?</p> <p>13 A. Yeah, because he was like this. I mean,</p> <p>14 he had his finger on his ear.</p> <p>15 THE WITNESS: Is that all right?</p> <p>16 MR. STRAVITZ: Yeah, I was going to</p> <p>17 let the record reflect that you were pulling on a</p> <p>18 certain ear.</p> <p>19 Q. Do you remember between the time that there</p> <p>20 was an instruction given as to this is going to be loud</p> <p>21 and whatever else was said between that and the actual</p>	<p>Page 35</p> <p>1 Q. You worked with him for how many years?</p> <p>2 A. Almost ten years.</p> <p>3 Q. I didn't quite understand. You said he told</p> <p>4 you that he was coming up from the galley previous to</p> <p>5 the firing?</p> <p>6 A. Right.</p> <p>7 Q. Do you remember -- do you actually remember,</p> <p>8 specifically recollect him, seeing him coming up from</p> <p>9 the galley?</p> <p>10 A. No.</p> <p>11 Q. Has he or any of the other partners expressed</p> <p>12 to you any concerns due to his current hearing problems</p> <p>13 affecting his work?</p> <p>14 A. They have not expressed that to me, no.</p> <p>15 Q. You stated that you fired a number of</p> <p>16 different types of guns. Are you familiar with the</p> <p>17 difference between the gauges of guns?</p> <p>18 A. Like 12 gauge and all that?</p> <p>19 Q. As opposed to 10 gauge?</p> <p>20 A. I know there's different gauges. I don't</p> <p>21 know the purposes whether it's more powerful or</p>

10 (Pages 34 to 37)

Lisa Henshaw - 1/22/04

	Page 38		Page 40
1	louder.	1	INDEX
2	Q. You said you remember this is being louder	2	Deposition of Lisa Henshaw
3	than any of the guns?	3	January 22, 2004
4	A. Absolutely. It's not even the same.	4	
5	MR. CHAKRABARTY: Nothing further.	5	Examination by:
6	MR. STRAVITZ: You have the right to	6	Mr. Bouse
7	review the transcript. You can make changes to	7	Mr. Skeen
8	substance or the form of your testimony within 30	8	Mr. Chakrabarty
9	days after you receive the transcript. Or you can	9	
10	waive that right and just let it go as it is. Most	10	Exhibit No.
11	people have been waiving the right. One partner	11	1. Diagram
12	wanted to review it.	12	
13	THE WITNESS: The transcript? Waive.	13	
14	MR. STRAVITZ: She'll waive.	14	
15	(Deposition concluded at 4:10 p.m.)	15	
16		16	
17		17	
18		18	
19		19	
20		20	
21		21	
		Page 39	
1	State of Maryland		
2	City of Baltimore, to wit:		
3	I, Louisa B. McIntire-Brooks, a Notary		
4	Public of the State of Maryland, County of Anne		
5	Arundel, do hereby certify that the within-named		
6	witness personally appeared before me at the time		
7	and place herein set out, and after having been duly		
8	sworn by me, according to law, was examined by		
9	counsel.		
10	I further certify that the examination		
11	was recorded stenographically by me and this		
12	transcript is a true record of the proceedings.		
13	I further certify that I am not of		
14	counsel to any of the parties, nor in any way		
15	interested in the outcome of this action.		
16	As witness my hand and notarial seal		
17	this 16th day of February, 2004.		
18			
19	Louisa B. McIntire-Brooks		
20	Notary Public		
21	My Commission Expires:		
	June 2004		

11 (Pages 38 to 40)